

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

MILAGROS FONSECA SOLA

DEBTOR

CASE NO 11-07162-BKT

CHAPTER 13

**DEBTOR'S MOTION AND NOTICE OF FILING OF POST-CONFIRMATION  
MODIFICATION OF CHAPTER 13 PLAN 11 USC §1329**

TO THE HONORABLE COURT:

**NOW COMES, MILAGROS FONSECA SOLA**, through the undersigned attorney, and very respectfully states and prays as follows:

1. The debtor is hereby submitting a post-confirmation modification of Chapter 13 Plan, 11 USC Section 1329, dated April 14, 2015, herewith and attached to this motion.
2. This Plan modification is filed to cure post-petition arrears owed to secured creditor Popular Auto LLC.

**NOTICE PURSUANT TO LOCAL BANKRUPTCY RULE 3015(f)(2)(b)**

**Within twenty-one (21) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.**

**I CERTIFY**, that on this same date a copy of this Notice was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee, and all CM/ECF participants; I also certify that a copy of this notice was sent via regular mail to the debtors and to all creditors and interested parties appearing in the master address list, hereby attached.

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Post confirmation modification of chapter 13 Plan  
Case no. 11-07162-BKT13

**RESPECTFULLY SUBMITTED.** In San Juan, Puerto Rico, this 14<sup>th</sup> day of April, 2015.

/s/Roberto Figueroa Carrasquillo  
ROBERTO FIGUEROA CARRASQUILLO  
USDC 203614  
ATTORNEY FOR PETITIONER  
PO BOX 186  
CAGUAS PR 00726-0186  
TEL 787-744-7699 FAX NO 787-746-5294  
EMAIL: [rfigueroa@rfclawpr.com](mailto:rfigueroa@rfclawpr.com)

United States Bankruptcy Court  
District of Puerto Rico

IN RE:

Case No. 11-07162-13

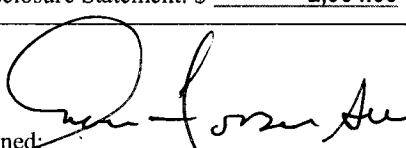
FONSECA SOLA, MILAGROS

Chapter 13

Debtor(s)

CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☒ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

|  |                                   |                 |                                   |                  |                                  |                 |                       |  |                       |  |   |  |   |  |                               |                         |                            |                               |                         |                            |                               |                         |                            |
|--|-----------------------------------|-----------------|-----------------------------------|------------------|----------------------------------|-----------------|-----------------------|--|-----------------------|--|---|--|---|--|-------------------------------|-------------------------|----------------------------|-------------------------------|-------------------------|----------------------------|-------------------------------|-------------------------|----------------------------|
| PLAN DATED: <u>4/14/2015</u> <input type="checkbox"/> AMENDED PLAN DATED: _____<br><input type="checkbox"/> PRE <input checked="" type="checkbox"/> POST-CONFIRMATION Filed by: <input type="checkbox"/> Debtor <input type="checkbox"/> Trustee <input type="checkbox"/> Other  |                                   |                 |                                   |                  |                                  |                 |                       |  |                       |  |   |  |   |  |                               |                         |                            |                               |                         |                            |                               |                         |                            |
| <p><b>I. PAYMENT PLAN SCHEDULE</b></p> <table style="width:100%;"> <tr> <td>\$ <u>220.00</u> x <u>12</u> = \$</td> <td><u>2,640.00</u></td> </tr> <tr> <td>\$ <u>280.00</u> x <u>42</u> = \$</td> <td><u>11,760.00</u></td> </tr> <tr> <td>\$ <u>520.00</u> x <u>6</u> = \$</td> <td><u>3,120.00</u></td> </tr> <tr> <td>\$ _____ x _____ = \$</td> <td></td> </tr> <tr> <td>\$ _____ x _____ = \$</td> <td></td> </tr> </table> <p style="text-align: right;">TOTAL: \$ <u>17,520.00</u></p> <p>Additional Payments:<br/>                 \$ _____ to be paid as a LUMP SUM<br/>                 within _____ with proceeds to come from: _____</p> <p><input type="checkbox"/> Sale of Property identified as follows:<br/>                 _____</p> <p><input type="checkbox"/> Other:<br/>                 _____</p> <p>Periodic Payments to be made other than, and in addition to the above:<br/>                 \$ _____ x _____ = \$ _____</p> <p style="text-align: right;">PROPOSED BASE: \$ <u>17,520.00</u></p> <p><b>III. ATTORNEY'S FEES</b><br/>                 (Treated as § 507 Priorities)</p> <p>Outstanding balance as per Rule 2016(b) Fee Disclosure Statement: \$ <u>2,904.00</u></p> <p>Signed: <br/>                 Debtor</p> <p>Joint Debtor</p> | \$ <u>220.00</u> x <u>12</u> = \$ | <u>2,640.00</u> | \$ <u>280.00</u> x <u>42</u> = \$ | <u>11,760.00</u> | \$ <u>520.00</u> x <u>6</u> = \$ | <u>3,120.00</u> | \$ _____ x _____ = \$ |  | \$ _____ x _____ = \$ |  | <p><b>II. DISBURSEMENT SCHEDULE</b></p> <p>A. ADEQUATE PROTECTION PAYMENTS OR _____ \$ _____</p> <p>B. SECURED CLAIMS:<br/> <input type="checkbox"/> Debtor represents no secured claims.<br/> <input checked="" type="checkbox"/> Creditors having secured claims will retain their liens and shall be paid as follows:</p> <ol style="list-style-type: none"> <li>1. <input checked="" type="checkbox"/> Trustee pays secured ARREARS:<br/> <table style="width:100%;"> <tr> <td>Cr. <u>BANCO POPULAR D</u> Cr. <u>POPULAR AUTO</u> Cr. <u>See Attached</u></td> </tr> <tr> <td># <u>Claim no. 6-2</u> # <u>82200109522200002</u> # _____</td> </tr> <tr> <td>\$ <u>3,057.57</u> \$ <u>1,247.18</u> \$ _____</td> </tr> </table> </li> <li>2. <input type="checkbox"/> Trustee pays IN FULL Secured Claims:<br/> <table style="width:100%;"> <tr> <td>Cr. _____ Cr. _____ Cr. _____</td> </tr> <tr> <td># _____ # _____ # _____</td> </tr> <tr> <td>\$ _____ \$ _____ \$ _____</td> </tr> </table> </li> <li>3. <input type="checkbox"/> Trustee pays VALUE OF COLLATERAL:<br/> <table style="width:100%;"> <tr> <td>Cr. _____ Cr. _____ Cr. _____</td> </tr> <tr> <td># _____ # _____ # _____</td> </tr> <tr> <td>\$ _____ \$ _____ \$ _____</td> </tr> </table> </li> <li>4. <input type="checkbox"/> Debtor SURRENDERS COLLATERAL to Lien Holder:</li> <li>5. <input type="checkbox"/> Other:</li> <li>6. <input checked="" type="checkbox"/> Debtor otherwise maintains regular payments directly to:<br/> <u>BANCO POPULAR D</u> <u>POPULAR AUTO</u></li> </ol> <p>C. PRIORITIES: The Trustee shall pay priorities in accordance with the law. 11 U.S.C. § 507 and § 1322(a)(2)</p> <p>D. UNSECURED CLAIMS: Plan <input type="checkbox"/> Classifies <input checked="" type="checkbox"/> Does not Classify Claims.</p> <ol style="list-style-type: none"> <li>1. (a) Class A: <input type="checkbox"/> Co-debtor Claims / <input type="checkbox"/> Other:<br/> <input type="checkbox"/> Paid 100% / <input type="checkbox"/> Other: _____<br/> <table style="width:100%;"> <tr> <td>Cr. _____ Cr. _____ Cr. _____</td> </tr> <tr> <td># _____ # _____ # _____</td> </tr> <tr> <td>\$ _____ \$ _____ \$ _____</td> </tr> </table> </li> <li>2. Unsecured Claims otherwise receive PRO-RATA disbursements.</li> </ol> <p>OTHER PROVISIONS: (Executory contracts; payment of interest to unsecureds, etc.)<br/>                 * Additional Attorney's Fees: \$350.00 payment for the services rendered in connection to debtor(s)' post confirmation plan and related procedures for approval, pursuant to R. 2016 (f)(3).<br/>                 * "Tax refunds will be devoted each year, as periodic payments, to the plan's funding until plan completion. The plan shall be deemed modified by such amount, without the need of further Court order. The debtor(s) shall seek court's authorization prior any use of funds."<br/>                 "Surrenders collateral": Shares/savings in any Cooperativa/Association/Bank.</p> | Cr. <u>BANCO POPULAR D</u> Cr. <u>POPULAR AUTO</u> Cr. <u>See Attached</u> | # <u>Claim no. 6-2</u> # <u>82200109522200002</u> # _____ | \$ <u>3,057.57</u> \$ <u>1,247.18</u> \$ _____ | Cr. _____ Cr. _____ Cr. _____ | # _____ # _____ # _____ | \$ _____ \$ _____ \$ _____ | Cr. _____ Cr. _____ Cr. _____ | # _____ # _____ # _____ | \$ _____ \$ _____ \$ _____ | Cr. _____ Cr. _____ Cr. _____ | # _____ # _____ # _____ | \$ _____ \$ _____ \$ _____ |
| \$ <u>220.00</u> x <u>12</u> = \$  | <u>2,640.00</u>                   |                 |                                   |                  |                                  |                 |                       |  |                       |  |   |  |   |  |                               |                         |                            |                               |                         |                            |                               |                         |                            |
| \$ <u>280.00</u> x <u>42</u> = \$  | <u>11,760.00</u>                  |                 |                                   |                  |                                  |                 |                       |  |                       |  |   |  |   |  |                               |                         |                            |                               |                         |                            |                               |                         |                            |
| \$ <u>520.00</u> x <u>6</u> = \$   | <u>3,120.00</u>                   |                 |                                   |                  |                                  |                 |                       |  |                       |  |   |  |   |  |                               |                         |                            |                               |                         |                            |                               |                         |                            |
| \$ _____ x _____ = \$  |                                   |                 |                                   |                  |                                  |                 |                       |  |                       |  |   |  |   |  |                               |                         |                            |                               |                         |                            |                               |                         |                            |
| \$ _____ x _____ = \$  |                                   |                 |                                   |                  |                                  |                 |                       |  |                       |  |   |  |   |  |                               |                         |                            |                               |                         |                            |                               |                         |                            |
| Cr. <u>BANCO POPULAR D</u> Cr. <u>POPULAR AUTO</u> Cr. <u>See Attached</u>   |                                   |                 |                                   |                  |                                  |                 |                       |  |                       |  |   |  |   |  |                               |                         |                            |                               |                         |                            |                               |                         |                            |
| # <u>Claim no. 6-2</u> # <u>82200109522200002</u> # _____  |                                   |                 |                                   |                  |                                  |                 |                       |  |                       |  |   |  |   |  |                               |                         |                            |                               |                         |                            |                               |                         |                            |
| \$ <u>3,057.57</u> \$ <u>1,247.18</u> \$ _____   |                                   |                 |                                   |                  |                                  |                 |                       |  |                       |  |   |  |   |  |                               |                         |                            |                               |                         |                            |                               |                         |                            |
| Cr. _____ Cr. _____ Cr. _____  |                                   |                 |                                   |                  |                                  |                 |                       |  |                       |  |   |  |   |  |                               |                         |                            |                               |                         |                            |                               |                         |                            |
| # _____ # _____ # _____  |                                   |                 |                                   |                  |                                  |                 |                       |  |                       |  |   |  |   |  |                               |                         |                            |                               |                         |                            |                               |                         |                            |
| \$ _____ \$ _____ \$ _____   |                                   |                 |                                   |                  |                                  |                 |                       |  |                       |  |   |  |   |  |                               |                         |                            |                               |                         |                            |                               |                         |                            |
| Cr. _____ Cr. _____ Cr. _____  |                                   |                 |                                   |                  |                                  |                 |                       |  |                       |  |   |  |   |  |                               |                         |                            |                               |                         |                            |                               |                         |                            |
| # _____ # _____ # _____  |                                   |                 |                                   |                  |                                  |                 |                       |  |                       |  |   |  |   |  |                               |                         |                            |                               |                         |                            |                               |                         |                            |
| \$ _____ \$ _____ \$ _____   |                                   |                 |                                   |                  |                                  |                 |                       |  |                       |  |   |  |   |  |                               |                         |                            |                               |                         |                            |                               |                         |                            |
| Cr. _____ Cr. _____ Cr. _____  |                                   |                 |                                   |                  |                                  |                 |                       |  |                       |  |   |  |   |  |                               |                         |                            |                               |                         |                            |                               |                         |                            |
| # _____ # _____ # _____  |                                   |                 |                                   |                  |                                  |                 |                       |  |                       |  |   |  |   |  |                               |                         |                            |                               |                         |                            |                               |                         |                            |
| \$ _____ \$ _____ \$ _____   |                                   |                 |                                   |                  |                                  |                 |                       |  |                       |  |   |  |   |  |                               |                         |                            |                               |                         |                            |                               |                         |                            |

Attorney for Debtor R. Figueroa Carrasquillo Law Office

Phone: (787) 744-7699

IN RE FONSECA SOLA, MILAGROS

Case No. 11-07162-13

Debtor(s)

**CHAPTER 13 PAYMENT PLAN**  
**Continuation Sheet - Page 1 of 1**

|                               | Cr           | #                   | \$       |
|-------------------------------|--------------|---------------------|----------|
| Trustee pays secured ARREARS: | POPULAR AUTO | Post-Petition0002   | 1,108.00 |
|                               | POPULAR AUTO | x0002 Post-petition | 3,531.73 |

Label Matrix for local noticing  
0104-3  
Case 11-07162-BKT13  
District of Puerto Rico  
Old San Juan  
Tue Apr 14 15:56:52 AST 2015

BANCO POPULAR PR  
MARTINEZ & TORRES LAW OFFICES PSC  
PO BOX 71375  
SAN JUAN, PR 00936-8475

POPULAR AUTO  
PO BOX 366818  
SAN JUAN, PR 00936-6818

BANCO POPULAR DE PR  
PO BOX 70100  
SAN JUAN, PR 00936-8100

Back Bowl I LLC, Series B  
c/o Weinstein & Riley, P.S.  
2001 Western Ave., Ste. 400  
Seattle, WA 98121-3132

GE Capital Retail Bank  
c/o Recovery Management Systems Corp  
25 SE 2nd Ave Suite 1120  
Miami FL 33131-1605

POPULAR AUTO  
BANKRUPTCY DEPARTMENT  
PO BOX 366818  
SAN JUAN PUERTO RICO 00936-6818

Recovery Management Systems Corporation  
25 S.E. 2nd Avenue, Suite 1120  
Miami, FL 33131-1605

JOSE RAMON CARRION MORALES  
PO BOX 9023884  
SAN JUAN, PR 00902-3884

ROBERTO FIGUEROA CARRASQUILLO  
PO BOX 186  
CAGUAS, PR 00726-0186

BACK BOWL I LLC SERIES B  
WEINSTEIN & RILEY P S  
2001 WESTERN AVE SUITE 400  
SEATTLE, WA 98121-3132

MIDLAND FUNDING LLC/AMERICAN INFOSOURCE LP  
PO BOX 4457  
HOUSTON, TX 77210-4457

US Bankruptcy Court District of P.R.  
Jose V Toledo Fed Bldg & US Courthouse  
300 Recinto Sur Street, Room 109  
San Juan, PR 00901-1964

BANCO POPULAR DE PUERTO RICO  
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PO. BOX 192938  
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(787)767-8244 FAX. (787)767-1183

Back Bowl I LLC, Series C  
c/o Weinstein & Riley, P.S.  
2001 Western Ave., Ste.400  
Seattle, WA 98121-3132

ISLAND FINANCE  
PO BOX 195369  
SAN JUAN, PR 00919-5369

POPULAR AUTO  
PO BOX 15011  
SAN JUAN, PR 00902-8511

SANTANDER FINANCIAL D/B/A ISLAND FINANCE  
PO BOX 195369  
SAN JUAN PR 00919-5369

MILAGROS FONSECA SOLA  
CONDADO MODERNO  
R12 15 STREET  
CAGUAS, PR 00725-2447

End of Label Matrix  
Mailable recipients 27  
Bypassed recipients 0  
Total 27

BACK BOWL I LLC SERIES C  
WEINSTEIN & RILEY P S  
2001 WESTERN AVE SUITE 400  
SEATTLE, WA 98121-3132

MIDLAND FUNDING LLC/RECOSER LLC  
25 SE 2ND AVE STE 1120  
MIAMI, FL 33131-1605

AEGPR  
PO BOX 364508  
SAN JUAN, PR 00936-4508

BANCO SANTANDER  
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SAN JUAN, PR 00936-2589

EOS CCA  
MONITRONICS  
700 LONGWATER DR  
NORWELL, MA 02061-1624

Midland Funding LLC  
by American InfoSource LP as agent  
PO Box 4457  
Houston, TX 77210-4457

Portfolio Investments I LLC  
c/o Recovery Management Systems Corp  
25 SE 2nd Avenue Suite 1120  
Miami, FL 33131-1605

WALMART  
PO BOX 530927  
ATLANTA, GA 30353-0927

MONSITA LECAROS ARRIBAS  
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500 TANCA STREET SUITE 301  
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